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Katherine Stadler (*Pro Hac Vice*)

Attorneys for the Fee Committee

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS, INC. <i>et al.</i> ,	:	Case No. 08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
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**STIPULATION BETWEEN BORTSTEIN LEGAL LLC
AND THE FEE COMMITTEE REGARDING THE
SIXTH INTERIM APPLICATION OF BORTSTEIN LEGAL LLC,
SPECIAL COUNSEL TO THE DEBTORS, FOR COMPENSATION AND
EXPENSES FOR THE PERIOD JUNE 1, 2010 THROUGH SEPTEMBER 30, 2010**

**TO: THE HONORABLE JAMES M. PECK
U.S. BANKRUPTCY JUDGE**

WHEREAS, on December 14, 2010, Bortstein Legal LLC (“Bortstein”) filed the *Sixth Application of Bortstein Legal LLC, Special Counsel to the Debtors and Debtors in Possession, For Interim Allowance of Compensation* (the “Sixth Fee Application”) [Docket No. 13451] seeking interim fees in the amount of \$241,890.00 for professional services rendered and no reimbursement for necessary and actual expenses;

WHEREAS, Bortstein has received from the Debtors 80 percent of the amounts invoiced to the Debtors for professional services rendered;

WHEREAS, pursuant to the *Order Appointing Fee Committee and Approving Fee Protocol* [Docket No. 3651], and consistent with the procedures set forth in the *Amended Fee Protocol* attached as Exhibit A to *Order Amending the Fee Protocol* [Docket No. 15998], counsel for the Fee Committee in Lehman Brothers Holdings, Inc. (the “Fee Committee”) has reviewed the Sixth Fee Application, issued a Confidential Letter Report on April 8, 2011, and entered into a dialogue with Bortstein regarding this application;

WHEREAS, as a result of this dialogue, Bortstein has agreed to accept the Fee Committee’s proposed disallowance of fees in the amount of \$6,813.75 for professional services rendered; and

WHEREAS, notwithstanding this Stipulation, the Sixth Fee Application remains subject to notice, an opportunity for a hearing, and Court approval under Rule 2016 of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. §§ 330, 331.

STIPULATION

NOW, THEREFORE, the Fee Committee and Bortstein hereby stipulate and agree that the Court may enter an order (to be submitted subsequently) approving Bortstein’s request for interim compensation and reimbursement of expenses in the reduced amount of \$235,076.25 in fees.

[Signature Page Follows]

Dated: Madison, Wisconsin
August 1, 2011

GODFREY & KAHN, S.C.

By: /s/ Katherine Stadler
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